

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KATHERINE SEAMAN, MARY RE SEAMAN,
and SANDRA TABAR, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE STUDENT LOAN
TRUST 2007-2; NATIONAL COLLEGIATE
STUDENT LOAN TRUST 2007-3;
TRANSWORLD SYSTEMS, INC., in its own right and
as successor to NCO FINANCIAL SYSTEMS, INC.;
EGS FINANCIAL CARE INC., formerly known as
NCO FINANCIAL SYSTEMS, INC.; and
FORSTER & GARBUS LLP,

Defendants.

No. 18-cv-1781

CHRISTINA BIFULCO, FRANCIS BUTRY,
and CORI FRAUENHOFER, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE STUDENT LOAN
TRUST 2004-2; NATIONAL COLLEGIATE
STUDENT LOAN TRUST 2006-4;
TRANSWORLD SYSTEMS, INC., in its own right and
as successor to NCO FINANCIAL SYSTEMS, INC.;
EGS FINANCIAL CARE INC., formerly known as
NCO FINANCIAL SYSTEMS, INC.; and
FORSTER & GARBUS LLP,

Defendants.

No. 18-cv-7692

FILED VIA ECF

DECLARATION OF ASHER HAWKINS
IN SUPPORT OF PLAINTIFFS' RENEWED MOTION
FOR SANCTIONS AGAINST THE TRANSWORLD DEFENDANTS
FOR THEIR DISCOVERY VIOLATIONS CONCERNING
THE EMPLOYEE-WITNESS KNOWN AS "EMPLOYEE A"

ASHER HAWKINS, an attorney duly licensed to practice law in the State of New York and admitted to practice in this Court, declares under penalty of perjury:

1. I am an attorney at law and an associate with Frank LLP, the attorneys of record for Plaintiffs and the Class in the above-captioned consolidated actions. I submit this declaration in further support of Plaintiffs' instant renewed sanctions motion.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts of the deposition in this litigation of Chandra Alphabet.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts of the deposition in this litigation of Valerie Watts.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts of the deposition in this litigation, via written questions, of Employee A.

5. Attached hereto as Exhibit D is a true and correct copy of the document that was produced in this litigation at Bates No. F&G_01003. This document is being filed publicly with redactions, to protect confidential information about individuals involved in this litigation. An unredacted copy of the document is being filed under seal.

Dated: New York, New York
March 29, 2022

By: /s/ Asher Hawkins

Asher Hawkins (AH2333)
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